

**IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND
(NORTHERN DIVISION)**

ERIE INSURANCE EXCHANGE	:	
t/i/o/u and t/u/o	:	
JODY B. ROSEN	:	
and	:	
JODY B. ROSEN,	:	
Individually	:	
and	:	
ERIE INSURANCE EXCHANGE	:	
t/i/o/u and t/u/o	:	
HOLLINGTON CONDOMINIUM COUNCIL	:	
OF UNIT OWNERS	:	
and	:	
HOLLINGTON CONDOMINIUM COUNCIL	:	
OF UNIT OWNERS,	:	
Individually	:	
Plaintiffs	:	
vs.	:	Case No. CCB-03CV143
SONY ELECTRONICS, INC.	:	
Defendant	:	

**PLAINTIFFS' MOTION TO MODIFY SCHEDULING ORDER WITH THE CONSENT
OF DEFENDANT**

COME NOW the Plaintiffs, Erie Insurance Exchange t/i/o/u and t/u/o Jody B. Rosen, Jody B. Rosen, Individually, Erie Insurance Exchange t/i/o/u and t/u/o Hollington Condominium Council of Unit Owners and Hollington Condominium Council of Unit Owners, Individually, by their attorneys McCarthy Wilson

and Edward J. Brown, and file this Motion to Modify Scheduling Order, and state:

1. That pursuant to the Scheduling Order, Plaintiffs' Rule 26(a)(2) Disclosures are due on or before April 7, 2003, and Defendant's Rule 26(a)(2) Disclosures are due on or about May 5, 2003.

2. That the parties are diligently and cooperatively pursuing their discovery obligations; however, the parties have not yet completed the initial exchange of paper discovery responses and/or an inspection of the evidence which survived the fire at issue in this case.

3. That a modification of the Scheduling Order by a forty-five (45) day extension of all presently set dates would not prejudice either party, and will still allow for the prompt resolution and/or adjudication of this matter.

4. That Defendant consents to this Motion.

WHEREFORE, Plaintiffs respectfully move this Court to grant it Motion to Modify Scheduling Order and extend all Scheduling Order dates by forty-five (45) days.

Respectfully submitted,

McCARTHY WILSON

Edward J. Brown, Esquire
100 South Washington Street
Rockville, Maryland 20850
(301) 762-7770
Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this _____ day of April, 2003 a copy of the foregoing Plaintiffs' Motion to Modify Scheduling Order was mailed, postage prepaid to:

Timothy L. Mullin, Esquire
Lauren N. Schultz, Esquire
Miles & Stockbridge, P.C.
10 Light Street, Suite 700
Baltimore, Maryland 21202
Attorneys for Defendant

Robert J. Hafner, Esquire
Lavin, Coleman, O'Neil, Ricci,
Finarelli & Gray
Suite 1000 - Penn Mutual Tower
510 Walnut Street
Philadelphia, Pennsylvania 19106
Attorneys for Defendant

Edward J. Brown, Esquire

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Plaintiffs	:	
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Defendant	:	

ORDER

UPON CONSIDERATION of the foregoing Plaintiffs' Motion to Modify Scheduling Order, and good cause having been shown, it is this _____ day of _____, 2003, by the United States District Court for the District of Maryland, hereby

ORDERED, that Plaintiffs' Motion to Modify Scheduling Order be and the same hereby is GRANTED; and, it is further

ORDERED, that the Scheduling Order in the above-captioned action be and the same hereby is MODIFIED AS FOLLOWS:

Plaintiff's Rule 26(a)(2) disclosures <u>re</u> experts	5/22/03
Defendant's Rule 26(a)(2) disclosures <u>re</u> experts	6/19/03
Plaintiff's rebuttal Rule 26(a)(2) disclosures <u>re</u> experts	7/3/03
Rule 26(e)(2) supplementation of disclosures and responses	7/11/03
Discovery deadline: submission of status report	8/3/03
Requests for admission	8/10/03
Dispositive pretrial motions deadline	9/4/03

Judge, United States District
Court for the District of
Maryland

Copies to:

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McCarthy Wilson
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Rockville, Maryland 20850

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